

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEIGH J. BECHTLE	:	CIVIL ACTION
Plaintiff,	:	
	:	NO. 20-5803
v.	:	
	:	Before the Hon. Michael M. Baylson
COUNTY OF DELAWARE	:	United States District Judge
Defendant	:	

**COUNT FOUR TO PLAINTIFF'S COMPLAINT
VIOLATIONS OF THE PENNSYLVANIA HUMAN RELATIONS ACT ("PHRA")
UNLAWFUL AGE DISCRIMINATION¹**

44. The foregoing paragraphs, the *ad damnum* clause and jury trial demand are incorporated herein in their entirety as if set forth in full.

45. In the manner set forth above and in violation of the PHRA, the County has engaged in knowing, willful, purposeful and unlawful discrimination by terminating Plaintiff's employment on account of his age.

46. As a result of the age discrimination inflicted by Defendant, Plaintiff has suffered damages including but not limited to denial of employment, lost wages, lost benefits, lost promotions, lost training, and lost experience.

47. As a result of age discrimination inflicted by Defendant, Plaintiff has also suffered emotional pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, and other non-pecuniary losses.

WEINSTEIN LAW FIRM, LLC

By: /s/ Marc E. Weinstein
Marc E. Weinstein, Esquire
Counsel to Plaintiff

¹ Plaintiff's complaint filed on November 19, 2020 contained three causes of action, and included 43 numbered paragraphs plus an *ad damnum* clause. Pursuant to Fed. R. Civ. P. 15(a)(2), Defendant has provided written consent to adding this PHRA count.

CERTIFICATE OF SERVICE

I, Marc E. Weinstein, Esquire, hereby certify that on this day I caused the foregoing document to be filed on the ECF system. Defendant's counsel is a filing users under the ECF system. Upon the electronic filing of a pleading or other document, the ECF system will automatically generate and send a Notice of Electronic Filing to all filing users associated with this case. Electronic service by the Court of the Notice of Electronic filing constitutes service of the filed document and no additional service upon the filing user is required.

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